

UNITED STATES DISTRICT COURT
for the

United States of America
v.
TIFFANY RAE REYNOLDS

Case No.

7:24mj2

Defendant(s)

CRIMINAL COMPLAINT


I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ the fall of 2016 _____ in the county of _____ Spartanburg _____ in the
_____ District of _____ South Carolina _____, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 2251	Production of child pornography
18 U.S.C. § 2252A(a)(2)(A)	Distribution of child pornography

This criminal complaint is based on these facts:
See attached affidavit

☐ Continued on the attached sheet.



Complainant's signature

Erin F. Carlisle, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

1/17/24



Judge's signature

City and state:

Greenville, SC

Kevin F. McDonald, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

IN THE MATTER OF THE APPLICATION)	CASE NO.:
OF THE UNITED STATES OF AMERICA)	
FOR AN ORDER AUTHORIZING AN ARREST)	UNDER SEAL
WARRANT FOR TIFFANY RAE REYNOLDS)	
)	

AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT

I, Special Agent Erin F. Carlisle, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. Your Affiant is a Special Agent with the FBI currently assigned to the Columbia Field Office, Greenville Resident Agency. As such, I am an “investigative or law enforcement officer” of the United States within the meaning of section 2510 (7) of Title 18 United States Code, and section 878 of Title 21 United States Code, and am empowered by law to conduct investigations and to make arrest for offenses enumerated in Section 2516 of Title 18, and Title 21 of the United States Code. Your Affiant has been employed as a Special Agent with the FBI since March 2017 and has been the case agent for investigating a variety of criminal violations which include kidnapping, crimes on the high seas, sexual assault, bank robbery, possession and distribution of child pornography, healthcare fraud, murder for hire, and public corruption.
2. The facts in this affidavit come from your Affiant’s personal observations, training, experience, and information obtained from other law enforcement personnel involved in

this investigation, namely Special Agents and Task Force Officers with the Federal Bureau of Investigation, along with a review of records obtained during this investigation.

3. Based upon my training and experience and facts as set forth in this affidavit, your Affiant believes there is probable cause to believe that violations of Title (1) 18 U.S.C. § 2251(b) - Sexual Exploitation of Children / Production of Child Pornography and (2) 18 U.S.C. § 2252A(a)(2)(A) – Distribution of Child Pornography occurred in the District of South Carolina.
4. Since this affidavit is being submitted for the limited purpose of establishing probable cause in support of an arrest warrant, I have not included each fact known concerning this investigation. The facts set forth are presented to establish probable cause for the issuance of an arrest warrant.

PROBABLE CAUSE

5. An FBI undercover officer received multiple child sexual abuse material images of a white, female child who appeared to be approximately five years old via the mobile messaging application KIK on December 16, 2016. On December 20, 2016, James Darnell Smith (Smith) of Silverhill, Alabama was arrested and charged by local law enforcement for distribution of child pornography. Smith was arrested federally for distribution, transportation, and possession of child pornography¹ in June 2017.
6. On November 15, 2017, Smith was interviewed by Special Agent Carolyn Middleton and FBI Task Force Officer Christopher Mitchell at the Baldwin County Jail in Minette, Alabama. Smith stated to investigators he was in communication with a woman on the

¹ James Darnell Smith plead guilty to Title 18 USC Sections 2252A(a)(1) Transportation of Child Pornography and 2252A(a)(5)(B) Possession of Child Pornography in the Southern District of Alabama on July 19, 2017. Smith was sentenced to 13 years and 1 month of incarceration.

dating platform Meet24. According to the profile, the woman lived in Gaffney, South Carolina and/or Mount Zion, South Carolina. Smith stated the woman created photos of herself and her daughter, "Kourtney", in which the daughter was shown touching her mother's genitals. The woman created these images and sent them to Smith at Smith's request. The images produced by the woman were later distributed by Smith to an FBI undercover officer. As part of the investigation, these nine images were submitted to the Nation Center for Missing and Exploited Children (NCMEC) for further analysis.

7. In December 2019, NCMEC referred a series of nine images to Operation Rescue Me (ORM) for assistance with identifying individuals in images depicting Child Sexual Abuse Material originally obtained during the aforementioned Smith investigation. Methods employed through the ORM initiative involve a concentrated effort to exploit clues and/or information observed in the background of child exploitation images/videos, leading first to the identification and rescue of the child victim(s), and second to the capture of the perpetrator.
8. The series of images sent to ORM consisted of several images of the apparent sexual exploitation of a juvenile female. On January 5, 2024, the subject's face was recognized to have visually similar characteristics of Tiffany Rae Reynolds (REYNOLDS). A further look into REYNOLDS's social media accounts produced a young female, REYNOLDS's daughter, in 2017 who strongly resembled the victim in the series. REYNOLDS lives in Deerfield, Ohio with a second minor female child.
9. REYNOLDS's daughter was identified as Kourtney Reynolds (hereafter referred to as Minor Victim). In Smith's interview, Smith provided the name "Kourtney" as the name of the child of the individual he was chatting with and receiving images from on Meet24.

10. On January 5, 2024, Tony Reynolds in Gaffney, South Carolina was shown an image of a woman and child. He positively identified his ex-wife, Tiffany REYNOLDS, and his 13-year-old daughter, Minor Victim. Tony and REYNOLDS share custody of Minor Victim.
11. On January 8, 2024, REYNOLDS was interviewed by Special Agent Peter Mauro and Portage County Sheriff's Office Detective Kenneth Romo at her home in Deerfield, Ohio. REYNOLDS stated she moved from South Carolina to Ohio around 2019. Prior to moving to Ohio, REYNOLDS lived with her grandmother, Patricia Ford, in Wellford, South Carolina.
12. REYNOLDS moved in with Patricia Ford and began online dating following her separations from her ex-husband. REYNOLDS met an individual on a dating website, but could not recall his name nor telephone number. The individual began asking REYNOLDS for innocuous images of herself and Minor Victim. After a few days, the individual asked REYNOLDS to produce sexually explicit images of Minor Victim. REYNOLDS believes she produced and distributed approximately 10 sexually explicit images of Minor Victim to the individual she met through the dating site. REYNOLDS sent the images through a combination of text messages and the online dating site.
13. REYNOLDS was shown a picture of a clothed child resting on REYNOLDS's bare chest. REYNOLDS positively identified the woman with the bare chest as herself and the child as Minor Victim.
14. REYNOLDS stated she took pictures of Minor Victim while she was sleeping wearing only underwear. In another picture, REYNOLDS pulled Minor Victim's underwear to the side exposing Minor Victim's vulva. REYNOLDS stated you could see Minor Victim's vulva in the picture. Another picture was of Minor Victim's bottom.

15. REYNOLDS stated she could not remember all of the images she took of Minor Victim, but did recall all the images were taken over the course of approximately a week and were sent to the individual she met through the dating site. Of the images produced, REYNOLDS and Minor Victim are the only two individuals in the images.
16. According to REYNOLDS, the images were produced in the fall time frame just before winter. Due to the age of Minor Victim in the images and the interaction between Smith and an FBI undercover officer in December 2016, law enforcement believes the images were produced and distributed in the fall of 2016.
17. REYNOLDS acknowledged the images were sent for sexual gratification. After sending the images, the individual stated they liked the illicit images of Minor Victim and requested more. REYNOLDS stated to law enforcement, "I knew it was wrong."
18. All the images were produced using a smartphone inside Patricia Ford's home in Wellford, South Carolina in the Fall of 2016. According to the South Carolina Department of Motor Vehicles, Patricia Ford resides at 460 Jordan Creek Farm Road, Wellford, South Carolina².

CONCLUSION

19. Based upon my training and experience and facts as set forth in this affidavit, your Affiant believes there is probable cause to believe Tiffany Rae REYNOLDS, who resided at 460 Jordan Creek Farm Road, Wellford, South Carolina, in the fall of 2016, produced and distributed multiple images depicting child pornography in violation of Title 18, United States Code, Sections 2251(b) and Sections 2252A(a)(2)(A) within the District of South Carolina.

² According to the South Carolina Department of Motor Vehicles, Patricia Ford has resided in Wellford, South Carolina since at least 2014.

20. Based on the above facts and circumstances, Affiant respectfully requests an arrest warrant be issued for Tiffany Rae Reynolds for violations of Title 18, United States Code, Section 2251(b) and Title 18, United States Code, Section 2252A(a)(2)(A).

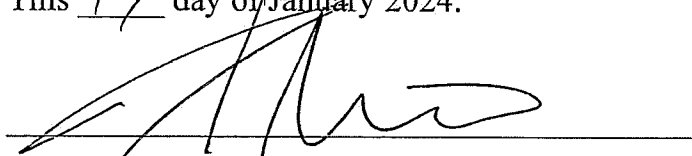


Erin F. Carlisle, Special Agent

Federal Bureau of Investigation

Sworn to and subscribed before me

This 17 day of January 2024.



KEVIN F. MCDONALD

UNITED STATES MAGISTRATE JUDGE